

Plaintiff Christine Livesay and
Nicholas DeSimone

February 19, 2021

419B Raritan Ave

Raritan, NJ 08869

Email: livesaychristine@gmail.com

Case 3:20-cv-17947-BRM-TJB

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Hon. Brian R. Martinotti, U.S.D.J. and
Hon. Tonianne J. Bongiovanni, U.S.M.J.
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
Clerk's, 402 E State St
Office Room 2020,
Trenton, NJ 08608

Dear Hon. Brian R. Martinotti, U.S.D.J. and
Hon. Tonianne J. Bongiovanni, U.S.M.J:

We are responding to a recent motion to dismiss our case, based on numerous reasons, set forth by Michael R. Sano, Deputy Attorney General, from the Attorney General's Office of New Jersey.

Due to the overwhelming nature of claims and several **false** claims that need to be refuted in Mr. Sano's request to dismiss, we would like a **30-day extension** from the deadline to respond to these claims, as to provide sufficient grounds for a **basis to not dismiss this case** but, in fact, to have this case heard. We kindly ask the date to respond be **extended to March 21, 2021**.

We hope you will extend us the same level of generosity that was given to Mr. Sano's requests when he asked for multiple extensions spanning approx. 50 days. Given the severity of the claims in our case, we need time to proceed carefully and have sufficient time to review over each reason for dismissal and respond accordingly.

Thank you in advance for your consideration on this matter and we hope you kindly grant our request.

Sincerely,

Christine Livesay
Nicholas DeSimone

SO ORDERED."



Dated: 2/24/2021

Brian R. Martinotti, U.S.D.J.